

SUB-SECTION 2: Storage and Disposal Subgroup

Through its Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the EPA is the only federal agency involved with labeling that mandates disposal instructions on product labels. This mandate creates a problem, since the research found that most residential consumers are not interested in the disposal information. Other agencies involved with labeling, for example, the Federal Trade Commission (FTC), do not have such mandates. FIFRA disposal statements may conflict, however, with state and local requirements and practices. These types of conflicts prompted the need for further investigation into storage and disposal issues during Phase II of the CLI. Additionally, storage and disposal instructions on product labels are frequently not read by consumers; this has, in some cases, lead to improper storage and disposal of products and containers.

Findings from Phase I

Phase I of the CLI found that consumers do not read storage and disposal information on product labels. The majority of consumers interviewed during the Phase I qualitative research indicated that the storage and disposal section of product labels contains information that they perceive as “common sense,” and they feel they have a fairly good understanding of the instructions already. Phase I research found, however, that consumers sometimes dispose of product containers improperly, either because of poor comprehension of the instructions, or because the instructions themselves (e.g., wrap in paper and dispose of in the trash) may conflict with state and local disposal laws or practices.

Goals and Objectives for Phase II

Phase II of the CLI addressed issues relating to storage and disposal of unused pesticide, insecticide, and household cleaner products, as well as disposal of empty containers of these products. Upon recommendation from Phase I of the CLI, a subgroup of CLI Partner and Task Force members interested in storage and disposal issues was formed to gain a better understanding of why interviewees do not read this information, and to investigate ways to increase interviewee comprehension and utilization of this information. One of the objectives for the group was to research what, if any, state and local storage and disposal regulations, policies, and practices exist for the three product categories and product containers. The Subgroup was charged with making recommendations for changes to storage and disposal language on product labels, as needed, so that consumers are not inadvertently instructed to store and dispose of unused product and containers in ways that violate their state and local laws and practices. The group also collaborated with the CLI Consumer Education Subgroup to find ways to increase consumers’ reading and comprehension of the storage and disposal sections of product labels.